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October 2, 2020

Via ECF

The Hon. Edgardo Ramos
U.S. District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

**Re: *PT Aurora Indonesia Trading v. USARM Group LLC*, No. 20 Civ. 7045 (ER) (JLC)
Unopposed Request for Extension of Time to Respond to Complaint**

Dear Judge Ramos:

We represent defendant in this action. We write to request, with the concurrence of plaintiffs' counsel, that defendant's deadline to move, answer, or otherwise respond to the complaint filed on August 31, 2020 be extended to November 16, 2020.

Conditioned on the foregoing extension, we would accept service of the summons and complaint electronically, and defendant would waive any defenses based on the sufficiency of service of process. Except as otherwise expressly provided herein, each party reserves, and does not waive, its claims, rights, and defenses.

Defendant's deadline to respond to the complaint may be October 14, 2020 based on plaintiffs' attempted service of process. This is the first request for an extension or adjournment of this deadline.

Plaintiffs' counsel consents to this request. Moreover, good cause exists for the agreed extension because plaintiff would not have to formally serve the summons and complaint, and defendant and its counsel require additional time to investigate the complaint and respond to it.

Respectfully,

/s/ Charles J. Nerko
Charles J. Nerko

Copy to: All counsel (via ECF)